

State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF HAZARDOUS WASTE MANAGEMENT

CN 028 Trenton, N.J. 08625-0028 (609) 633-1408 Fax # (609) 633-1454

Laura J. Livingston, Chief USEPA, Region II 26 Federal Plaza New York, New York 10278

April 12, 1991

V C1101=\$ V C1101=\$

Dear Ms. Livingston:

Enclosed is a copy of a letter from Quanex Corp. Atlantic Tube requesting the following information changes(s):

- 1. Company Name

 2. Corporate Name/Ownership

 3. Company Contact

 4. EPA ID Number

 5. Notification Status to: TSD

 Transporter
 Generator
 Non-Handler

 X
- 6. Generator/Company Closure
 DELIST EPA ID. NO NJD000544510 AS DED
- 7. Other INSPECTION REPORT RECOMMENDATIONS (SEE ATTACHED)

Please make the indicated changes to your RCRA mailing address file. Your attention in this matter would be greatly appreciated.

Sincerely

Ferd Scaccetti,

S.Q. Generator

Bureau of Manifest & Information Systems

CB:dag Enclosure



DELISTING INSPECTION REPORT

,	PACILITY INFORMATION
Name:	QUANEX GRP ATLANTIC TUBE
Address:	20 HARMICH RO
	SOUTH PLAINFIELD NJ. 07080
Lot:	
County:	MIDDLESEX
Phone:	(800) 521-8416
EPA ID No.:	NJD 000544510
Date of Inspection:	MARCH 26, 1991
	•
	PARTICIPATING PERSONNEL
State or EPA Personnel:	DOUGLAS GREENFIELD
Facility Personnel:	
Report Prepared by:	DOUGLAS GREENFIELD
Bureau:	DHWM / CBFO
	(609) 584-4150
Reviewed by:	
Date of Review:	3/30/11
	/ /

SUMMARY OF FINDINGS

FACILITY DESCRIPTION AND PRESENT OPERATIONS: The
facility consists of 2 buildings, the first
in order) process on the wind
is over 100,000 sq. ft. with an office at one
end and the second is about 60,000 sq. ft. The
first building heresed the tube drawing operations
and the second was used as a worshouse. The
aparation of rechaining standard size tubing to
specifical olemensions of customers. Only Earlow
steel and low allow steel tubing was processed
At the gresent time Quarry Corporation
has sub-leased the 100 and to 1 it is
has sub-leased the 100,000 sq ft building
to Channels Home Center, Inc. for wasekousing
of building material. The office area is unoccurred
The second building is vacant and for
sext.
DESCRIPE THE ACTIVITIES THAT BODY PRODUCT
DESCRIBE THE ACTIVITIES THAT FORMERLY RESULTED IN THE GENERATION OF HAZARDOUS WASTES: Surving the tube.
diawing operation, the trobe is first cleaned with
suffuric acid to remove scale. Also in the
groces the Weber are rensect and get in a
Caustic bath. The hayardous waste was generaled
from these vieles as spent acres (ko62) and
spent caustic (Door). Also acid sludge (KOGZ) was
generated when the acid tanks were cleaned.
8

MENORANDUM

To: John Skoviak, Section Chief

Program Oversight Tracking and Reporting

From: Ferd Scaccetti, Supv. Environmental Specialist

Bureau of Manifest and Information Systems

Subject: Delisting Petition - Inspection Referral

Date: January 14, 1991

Enclosed please find:

1. A photocopy of a letter from

Quanex Corporation - Atlantic Tube 20 Harmich Rd South Plainfield, NJ 07080

requesting delisting as a generator of their EPA identification number NJD000544510

2. A manifest report listing all manifests generated by this company from 1987 to the present in date order. If no report is attached it means that the company has had no manifest activity during this time period.

Please investigate the validity of this delisting request and make the appropriate recommendations. If you should have any questions or require any additional information, please contact me at 3-1394.

SUMMARY OF FINDINGS

IDENTIFY HAZARDOUS WASTES STILL REMAINING AT THE SITE:
Maria
- Mones
HOW HAVE THESE ACTIVITIES CHANGED SO AS TO JUSTIFY DELISTING THE COMPANY:
The company ceased operations and remove
The company ceased operations and remove all equipment. Received a negative declaration three ECRA dated 5-16-88. During cleanup removed 15DCY'S of 14W soil and removed 4 UG 57 The cost of cleanup was 286,000.
Three ECRA dated 5-16-88. During cleanur
semoved 150 Cy's of 14.W soil and removed 4 UG 57
The cost of cleanup was \$286000.
NOTE: COPIES OF COMPANY RECORDS WHICH SUPPORT COMPANY'S REQUEST FOR DELISTING SHOULD BE ATTACHED.
CONGLUCION GUOVED THE CONGLUCION
CONCLUSION: SHOULD THE GENERATOR'S REQUEST FOR DELISTING BE GRANTED?
YES YES
NO
IF NO, EXPLAIN:
•
*

Quanex Corporation Tube Group 17177 N. Laurel Park Dr. Suite 307 Livonia, MI 48152



Tube Group

(313) 591-2211 (800) 521-8416

August 20, 1990

Mr. C. Baldeo, Section Chief New Jersey Department of Environmental Protection Division of Hazardous Waste Management Bureau of Manifest & Information Systems 401 E. State Street, 5th Floor CN 028 Trenton, New Jersey 08625

Dear Mr. Baldeo:

I called your office today in response to your letter of August 16, 1990 (copy attached). A member of your staff confirmed that you have already received the Annual Report for 1989 from Quanex Corporation - Atlantic Tube Division since June 1990. In fact, it was sent through our consultant Dan Raviv Associates (see enclosed). I fail to understand the reasons for the Notice of Violation.

Please correct your records to indicate the fact that the report has been received and that Quanex Corporation is not in Violation of Solid Waste Management Act, N.J.S.A. 13:1E-1 et seq. and the related regulations. It is requested that you sign the enclosed letter and return to us in the selfaddressed stamped envelope provided herewith so that we have evidence that the subject report was received by your office.

Also, we are awaiting confirmation of our request to remove Quanex Corporation from the active list of waste generators because Quanex - Atlantic Tube Division ceased operations since January 1987 and the ECRA clean-up was completed as of April 27, 1989. Please confirm that you have removed our name from the active list of waste generators in the State of New Jersey.

If you have any questions, please feel free to call me at 1-800-521-8416, Ext. 44. Your cooperation is greatly appreciated.

Sincerely,

Viren M. Parikh Group Controller

VMP:1d

Enclosures (2)

NJO 000544510

ECRA CASE # 67034

20 Harmich Kd

So. Plaintieta, 07080

J0054451C

Quanex Corporation 20 Harmich Road South Plainfield, N.J. 07080 (201) 561-6000



RZZ

United States Environmental Protection Agency Region II 26 Federal Plaza New York, New York 10278

Gentlemen:

Attached please find our Annual Report (1983) for the disposal of our chemicals.

Very truly yours,

QUANEX

ATLANTIC TUBE DIVISION

George C. Schafer Purchasing Agent

Seorge C. Schafes

GCS/jf Attachment

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DEC 10 OZ PH 92 MEW YORK, M.Y. 10007 Quanex Corporation 20 Harmich Road South Plainfield, N.J. 07080 (201) 561-6000



Atlantic Tube Division PAB

June 21, 1982

Mr. Kenneth S. Stoller, P.E.
Acting Director, Air & Water Management Div.
United States Environmental Protection Agency
Region 11
26 Federal Plaza
New York, New York 10278

Dear Mr. Stoller;

Re: EPA I.D.#NJD-000544510

With reference to your form letter re: "Financial and Liability Requirements for Hazardous Waste Treatment, Storage and Disposal Facilities" received on this date, we are listed as an owner or operator of such a facility.

I believe that an error has been made in our listing in as much as we are actually a steel production plant and a small generator. For your information we store our waste products in approved containers only until we have a truck load (40,000 lbs.), at which time we have SCA Chemical Services remove, transport and dispose of the waste products according to all Federal and State regulations.

Therefore, I believe that as a small generator we are exempt from filing the financial and liability requirements requested in your letter.

I am also applying to Dr. Richard Baker, Chief of Permits Administration Branch to amend our application to read "Small Generator".

If you require further information, please contact me at (201) 561-6000 - Extension 287.

GCS/mmg

U.S. ENVICONMENTAL PROTECTION AGENCY. REGION II NEW YORK, H.Y.

JUH 22 10 38 AM "BZ

AIR & WASTE MANAGEMENT DIVISION Sincerely yours,

George C. Schafer, Purchasing Agent

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79016

GSA No. 0246-EPA-OT

X. DESCRIPTION OF HA	ZARDOUS WAST	ES (continued from	front)		
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ap.

File Reg NJD000544510

Federal Register / Vol. 45, No. 98 / Monday, May 19, 1980 / Rules and Regulations

33145

Please print or type	with ELITE type (12 characters per inch).	Form Approved OMB No. 158-R00XX
≳EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE REPORT	I. TYPE OF HAZARDOUS WASTE REPORT PART A: GENERATOR ANNUAL REPORT
16/2	A TE WAS PERSON OF THE THE	THIS REPORT IS FOR THE YEAR ENDING DEC.31. 1 9 80
		PART B: FACILITY ANNUAL REPORT
	PLEASE PLACE LABEL IN THIS SPACE	THIS REPORT FOR YEAR ENDING DEC. 31, 1 9
		PART C: UNMANIFESTED WASTE REPORT
		THIS REPORT IS FOR A WASTE RECEIVED (day, mo., & yr.)
information on the correct, leave Sect	label is incorrect, draw a line through it and supply the t	e front of this pamphlet; affix it in the designated space above—left. If any of the correct information in the appropriate section below. If the label is complete and a preprinted label, complete all sections. "Installation" means a single site where the specific instructions for generators or facilities before completing this form. e Resource Conservation and Recovery Act).
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IX. CERTIFICA		
beend on my in	nuiry of those individuals immediately responsible for obta	nilier with the information submitted in this and all attached documents, and that aining the information. I believe that the submitted information is true, accurate, false information, including the possibility of fine and imprisonment.
		1/
GEORG	EC SCHAFER Deo	rge C Schafer 1/8/81
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OF 4

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PAGE Q OF 4

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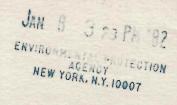
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PAGE 4 OF 4

Quanex Corporation 20 Harmich Road South Plainfield, N.J. 07080 (201) 561-6000





January 5, 1982

file

United States Environmental Protection Agency Region II 26 Federal Plaza New York, New York 10278

Gentlemen:

Attached find our Annual Report on the disposal of our chemicals.

Very truly yours,

George C. Schafer Purchasing Agent

GCS/jf Enc: 1

Please print or typ	be with ELITE type (12 characters per inch).	GSA No. 12345-XX Form Approved OMB No. 158-R00XX
≎ EPA	U.S. ENVIRONMENTAL PROTECTION AGENCY	I. TYPE OF HAZARDOUS WASTE REPORT
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		THIS REPORT IS FOR THE YEAR ENDING DEC.31.
		PART B: FACILITY ANNUAL REPORT
	PLEASE PLACE LABEL IN THIS SPACE	THIS REPORT FOR YEAR ENDING DEC. 31, 1 9
		PART C: UNMANIFESTED WASTE REPORT
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EPA Form 8700-13 (5.80)

PAGE 1 OF 2

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EPA Form 8700-13 (5-80)

PAGE 1 OF 2

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PAGE 2 OF 2



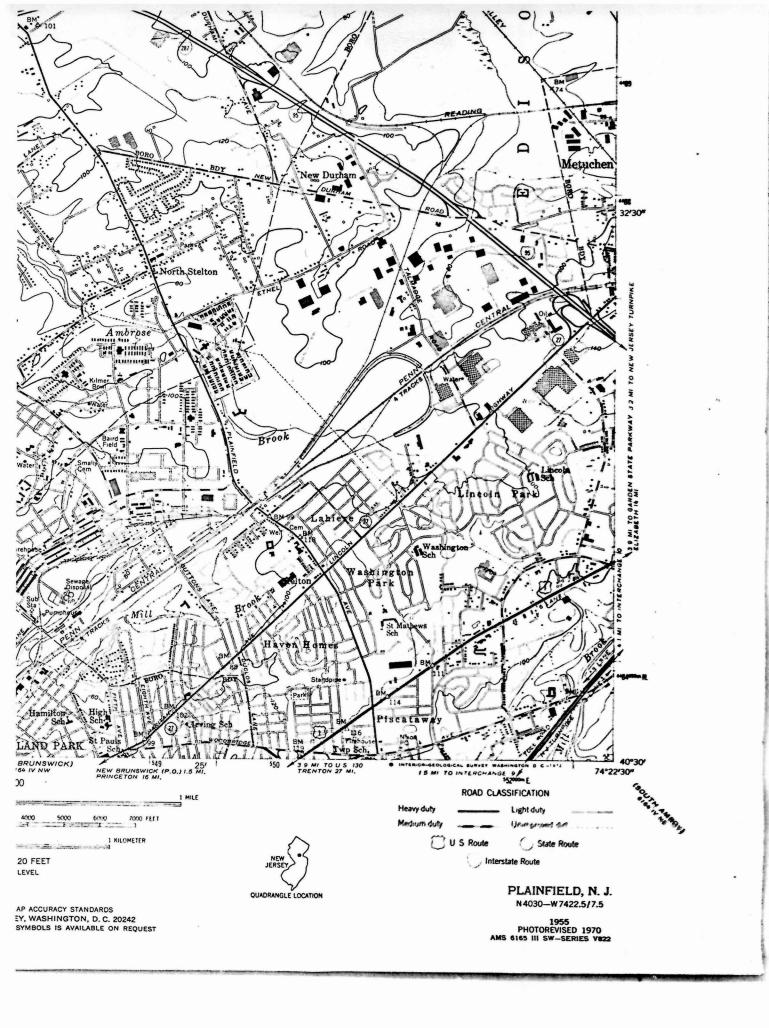
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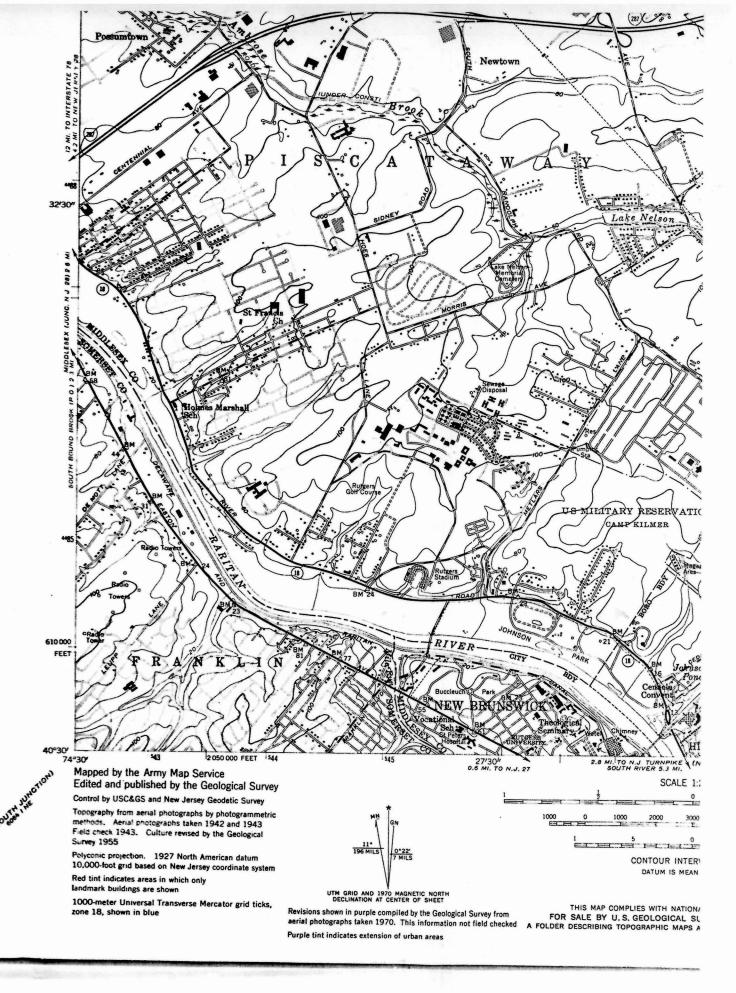
This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

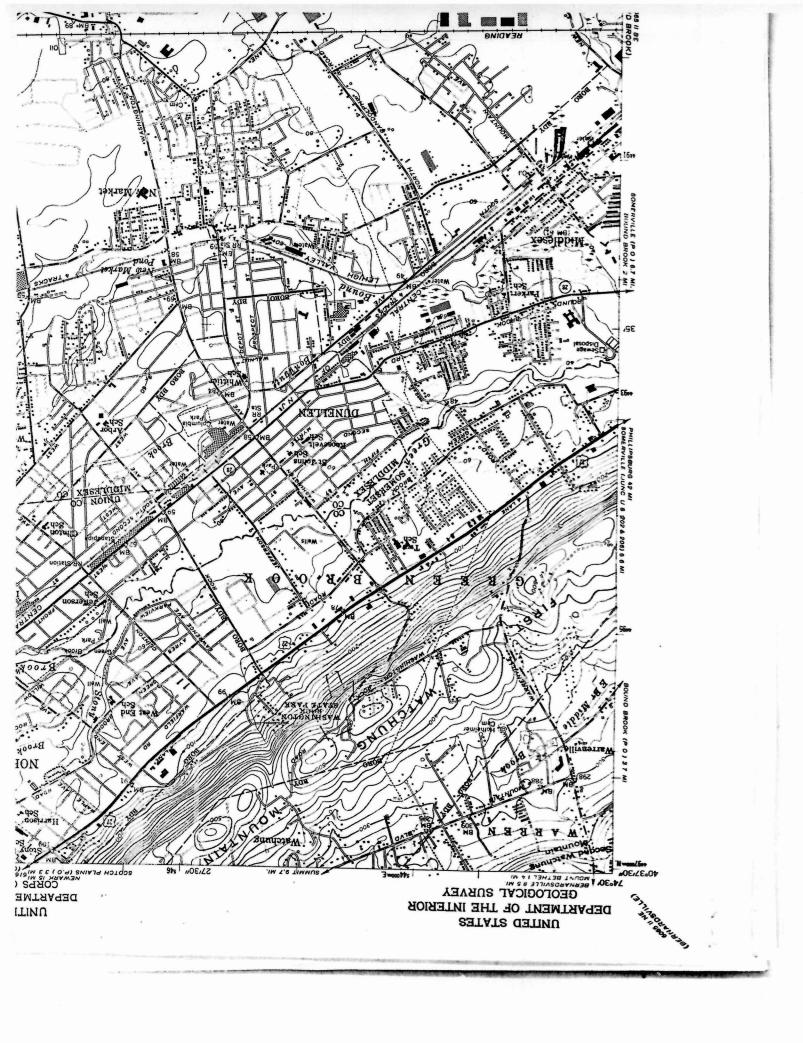
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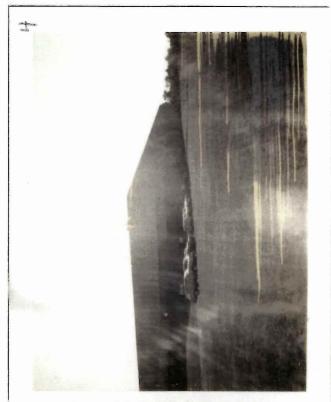












08/11/6

PLANT-FRONT-LEFT SIDE OF BLDG.

PLANT-FRONT & COMPLETE RIGHT SIDE

1456066









PRANT-RIGHT SIDE + PARTIAL REAR

PLANT-LEFT NEAR + SIDE. (PARTIAL)

EMPTY DRUM STORAGE

1 4 2 8 0 9 L

1458065



RANT- LEFT REAR - PARTIAL
DRUMS WAITING FOR SHIPMENT
TO BURIAL AREA.

08/81/6

Atlantic Tube Division Quanex Corporation 20 Harmich Road South Plainfield, N.J. 07080 (201) 561-6000



QUANEX CORPORATION Corporate Headquarters 4801 Woodway, Suite 280 West Houston, Texas 77056

Corporate Officers

Carl E. Pfeiffer

F. James Farquhar

Harold Bond

Randolph B. Hancock

Robert V. Kelly, Jr.

Robert L. O'Shieles

M. Victor Walberg

Kenneth E. Stone

Robert L. Mitchell

Gary L. Hellner

James D. Tracy

James W. Collier

William J. Robertson

President & Chief Executive Officer

Executive Vice President

Vice President

Vice President - Sales

Vice President

Vice President

Vice President

Vice President - Finance

Controller

Treasurer

Secretary

Assistant Secretary

Assistant Secretary

45000544510

DEC 7 1982

Mr. George C. Schafer Purchasing Agent Quanex Atlantic Tube Division 20 Harwick Road South Plainfield, N.J. 07080

Subject: RCRA Status of Quanex Atlantic Tube Division, EPA I.D. No. NJD000544510

Dear Mr. Schafer:

By letter of June 21, 1982 you requested that your company be deleted from our records as a treatment, storage and disposal ("TSD") facility and reclassified as a small quantity generator under the Resource Conservation and Recovery Act ("RCRA"). To be deleted as a TSD facility you must address the activities which you listed on your Part A Permit Application. If you no longer treat or dispose of hazardous wastes at your facility and do not store wastes for periods exceeding 90 days, resubmit your request and the change can be made.

In order to be considered a small quantity generator a company must produce less than 1,000 kilograms (approximately 2,200 lbs.) of waste in a calendar month. In the aforementioned letter you state that wastes are accumulated in quantities up to 40,000 lbs., clearly exceeding the RCRA limits. Therefore you cannot be classified as a small quantity generator.

Should you have any questions on this matter, contact John Hajduk of my staff at (212) 264-9880.

2PM-PA

Sincerely yours,

Richard A. Baker Chief Permits Administration Branch Office of Policy & Management

2PM-PA:HAJDUK:X9880:av:12/3/82

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941 12/6

Quane Corporation
20 Harmich Road
South Plainfield, N.J. 07080
(201) 561-6000



June 21, 1982

Dr. Richard Baker
Chief of Permits Administration Branch
United States Environmental Protection Agency
Region 11
26 Federal Plaza
New York, New York 10278

Dear Dr. Baker;

Re: EPA I.D.#NJD-000544510

With reference to the attached letter to Mr. Stoller re: Financial and Liability Requirements" for disposal facilities; I believe that a possible error was made on our original permit application. We are actually a steel redraw tube mill and a small generator. As we accumulate the chemicals we store them in approved containers only until we have a truck load (40,000 lbs.), then have them disposed of by SCA Chemical Services according to Federal and State regulations.

Would you please amend our permit to "Generator" rather than "Treatment Facility".

If you require further information, please contact me at (201) 561-6000 - Extension 287.

Sincerely yours,

George C. Schafer, Purchasing Agent

GCS/mmg Attachment Quanex Corporation 20 Harmich Road South Plainfield, N.J. 07080 (201) 561-6000



June 21, 1982

Mr. Kenneth S. Stoller, P.E.
Acting Director, Air & Water Management Div.
United States Environmental Protection Agency
Region 11
26 Federal Plaza
New York, New York 10278

Re: EPA I.D. #NJD-000544510

Dear Mr. Stoller;

With reference to your form letter re: "Financial and Liability Requirements for Hazardous Waste Treatment, Storage and Disposal Facilities" received on this date, we are listed as an owner or operator of such a facility.

I believe that an error has been made in our listing in as much as we are actually a steel production plant and a small generator. For your information we store our waste products in approved containers only until we have a truck load (40,000 lbs.), at which time we have SCA Chemical Services remove, transport and dispose of the waste products according to all Federal and State regulations.

Therefore, I believe that as a small generator we are exempt from filing the financial and liability requirements requested in your letter.

I am also applying to Dr. Richard Baker, Chief of Permits Administration Branch to amend our application to read "Small Generator".

If you require further information, please contact me at (201) 561-6000 - Extension 287.

Sincerely yours,

George C. Schafer, Purchasing Agent



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II 26 FEDERAL PLAZA NEW YORK, NEW YORK 10278

NJD-000 544510

Re: Financial and Liability Requirements for Hazardous Waste Treatment,
Storage and Disposal Facilities

and the white third derive the communer was not the chief to the affile

Dear Sir/Madam:

As you may be aware, the U.S. Environmental Protection Agency promulgated financial requirements (effective July 6, 1982) pursuant to Subtitle C of the Resource Conservation and Recovery Act (RCRA). The Agency also promulgated liability requirements (effective July 15, 1982) pursuant to Subtitle C of RCRA. These regulations apply to owners or operators of hazardous waste treatment, storage and disposal (TSD) facilities. Pursuant to a Notification and Part A application previously filed, you are presently the owner or operator of such a facility.

The regulations governing financial requirements are found at Title 40, Code of Federal Regulations (CFR), Sections 265.140 to 265.150. (47 Federal Register 15032, April 7, 1982.) All owners or operators of hazardous waste treatment, storage or disposal facilities must estimate the costs of closure of their facilities and obtain financial assurance of the ability to meet those costs. In addition, owners or operators of disposal facilities must estimate the costs of post-closure care of their facilities and obtain financial assurance for those costs. These requirements must be met as specified in 40 CFR §§265.142, 265.143 and 265.144. You must submit to this office by July 6, 1982, appropriate information that demonstrates your financial ability to close and care for your facility, as specified in these regulations.

A facility which is located in a State which has hazardous waste regulations that include requirements for financial assurance of closure or post-closure care may use State-required financial mechanisms if they are equivalent to 40 CFR Part 265.143. The Regional Administrator will determine whether the State mechanisms are equivalent to Federal mechanisms. Federal mechanisms include a trust fund, a letter of credit, a surety bond, a financial test, or an insurance policy. (Municipalities may not use the financial test because the Agency was unable to develop a set of financial indicators that would be suitable for municipalities in general.) Further, there is no exemption from the requirement for facilities with small closure cost estimates, because a small cost does not indicate a small risk of damage.

The regulations governing liability requirements are found at Title 40, Code of Federal Regulations (CFR), Section 265.147. (47 Federal Register 16544, April 16, 1982.) All owners or operators of hazardous waste treatment, storage or disposal facilities must demonstrate that they have liability insurance for sudden accidental occurrences at their facilities. In addition, owners or

operators of a landfill, surface impoundment, or land treatment facility must demonstrate that they have liability insurance for nonsudden accidental occurrences at their facilities. Either an insurance policy or a financial test may be used to demonstrate third party liability coverage. You must submit to this office by July 15, 1982, the appropriate documentation for liability coverage as specified in 40 CFR §265.147.

The financial assurance and liability requirements set forth above apply to hazardous waste TSD facilities. Should you determine that you do not meet the definition of such a facility, or that your original permit application was in error, you should amend or withdraw that application. To do so, call Dr. Richard Baker, Chief of our Permits Administration Branch, at (212) 264-9881.

Please note that your State may have additional, or more stringent financial responsibility requirements. In order to determine what State regulations may apply to your facility, you should contact the appropriate individual listed at the end of this letter.

If you have any questions about EPA's financial requirements, you should contact Helen S. Beggun at (212) 264-9860. Please include your EPA I.D. No. with any correspondence or submittal in response to this letter.

Sincerely yours,

Kenneth S. Stoller, P.E.

Acting Director

Air & Waste Management Division

Enclosure - Regulations

For questions about State laws and regulations call:

In New Jersey: Mark McQuerrey, (609) 292-9120 In New York: Norman Nosenchuck, (518) 457-6603

In Puerto Rico: Luis de la Cruz, (809) 725-8992

In the U.S. Virgin Islands: Joel Golumbek, (212) 264-7309



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT 32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON DIRECTOR

March 7, 1983

LINO F. PEREIRA
DEPUTY DIRECTOR

George Schafer Quanex Atlantic Tube Division 20 Harmich Road South Plainfield, New Jersey 07088

RE: Hazardous Waste TSD facility status of Quanex Atlantic Tube Division, South Plainfield, EPA ID #NJD000544510

Dear Mr. Schafer:

This letter will serve as a confirmation of your telephone conversation of March 4, 1983 with Mr. Ernest Kuhlwein of my staff concerning the hazardous waste facility operating status of your company. In your telephone conversation, you stated that Quanex stores all of its hazardous waste in containers and ships the same off-site within ninety (90) days of the initial date of generation. You also stated that the SO2 (tank storage) process filed for in your RCRA Part A application applies to your company's pickling solution tanks.

As understood by this office, said tanks are actually part of your company's manufacturing process, as such pickling solutions are repeatedly re-used, and when the pickling solution becomes spent, it is pumped directly from these tanks into an authorized hauler's tanker truck, which then transports the waste to an authorized off-site facility for treatment.

Under such circumstances, this Bureau concludes that these tanks are not per se waste storage tanks, and were inappropriately listed in your company's Part A application. Therefore, we are amending our records on your company's hazardous waste TSD activity to reflect only S01 (container storage). As was noted in my letter to your company dated March 3, 1983, your company's S01 activity has been exempted from regulation as a TSD facility, and is subject to regulation as a generator only, provided compliance with the provisions of N.J.A.C. 7:26-9.3 is maintained.

Hmoup OH Mr. George Schafer Quanex Atlantic Tube Division Page 2

If I have misinterpreted any part of your conversation with Mr. Kulhwein, please do not hesitate to contact me.

Very truly yours,

Frank Coolick, Chief Bureau of Hazardous Waste Engineering

FC:EK:jb

cc Joel Golumbek
USEPA - Region II



State of New Jersey

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF WASTE MANAGEMENT 32 E. Hanover St., CN 027, Trenton, N.J. 08625

JACK STANTON DIRECTOR LINO F. PEREIRA
DEPUTY DIRECTOR

0 3 MAR 1983

Quanex Atlantic Tube Division 20 Harmich Road South Plainfield, NJ 07088

RE: Facility Operating Status

Dear Sir:

The Bureau of Hazardous Waste Engineering has reviewed your company's response to the Notice of Violation, Failure to Submit Annual Report. The Bureau finds that the response contains adequate information to determine the operating status of this facility with respect to N.J.A.C. 7:26-l et seq., the New Jersey Hazardous Waste Management Regulations. The Bureau has determined that the company's hazardous waste treatment, storage or disposal facility as delineated in the company's RCRA Part A application and identified by the following EPA ID Number:

EPA ID NO.NJD000544510

has been excluded from regulations under N.J.A.C. 7:26-1.1 et seq. because your facility accumulates hazardous waste on-site for less than 90 days. This exclusion classifies your facility solely as a generator provided the following conditions are complied with:

- 1. All such waste is, within 90 days or less, shipped off-site to an authorized facility or placed in an on-site authorized facility, as defined at N.J.A.C. 7:26-1.4.
- 2. The waste is placed in containers which meet the standards of N.J.A.C. 7:26-7.2 and are managed in accordance with N.J.A.C. 7:26-9.4(d).
- The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.
- 4. The generator complies with the requirements for owners and operators of N.J.A.C. 7:26-9.6 and 9.7 concerning preparedness and prevention, contingency plans and emergency procedures as well as N.J.A.C. 7:26-9.4(g) concerning personnel training.

New Jersey Is An Equal Opportunity Employer



- 5. For bulk accumulation of dry hazardous waste materials, the waste pile is managed according to the following:
 - (i) The waste pile is no larger than 200 cubic yards; and
 - (ii) The pile shall be placed on an impermeable base that is compatible with the waste; and
 - (iii) Run-on shall be diverted away from the pile; and
 - (iv) Any leachate and run-off from the pile must be collected and managed as a hazardous waste.

This written acknowledgement of the exclusion of the above identified facility from N.J.A.C. 7:26-1 et seg. is based expressly on the review of the aforementioned correspondence. This letter makes no claim as to the extent and physical condition of the actual hazardous waste activities occuring at the site mentioned above.

Your company's hazardous waste facility above is no longer included in DEP's list of "existing facilities" (see N.J.A.C. 7:26-1.4 and 12.3) and therefore does not need to conform with the interim operating requirments of N.J.A.C. 7:26-1 et seq. for "existing facilities" which would include the TSD facility annual report. It is the company's responsibility to operate within the conditions listed above. To operate a hazardous waste facility without prior approval from the DEP is a violation of the Solid Waste Management Act N.J.S.A. 13:1E-1 et seq.

As a result of the conclusions previously made, the Notice of Violation entitled "Failure to Submit Annual Report" signed by Mr. David Shotwell is rescinded and need not be complied with.

If you have any questions on this matter, please call my office at (609) 292-9880.

Very truly yours,

Frank Coolick, Chief

Bureau of Hazardous Waste Engineering

FC:jb

cc Dave Shotwell
NJDEP, Division of Waste Management

Tom Taccone USEPA, Region II

Quanex Corporation 20 Harmich Road South Plainfield, N.J. 07080 (201) 561-6000





January 14, 1983

NJ0000544510

United States Environmental Protection Agency Region II 26 Federal Plaza New York, New York 10278

Gentlemen:

Attached find our Annual Report (1982) for the disposal of our chemicals.

Very truly yours,

QUANEX/ATLANTIC TUBE DIVISION

George C. Schafer Purchasing Agent

GCS/jf

Attach: 1

GENERATOR A (Collected under the		TECTION AGENCY		
FOR OFFICIAL	authority of	REPORT — PART A Section 3002 of RCRA.)		
		1 9 X. GENERA	TOR'S EPA I.D. NO.	
(Items 1 and 2)		GNJD	000544510	J/A
. FACILITY'S EPA I.D. NO.	ITY ADDRES	SS (street or P.O. bax, city,	state, & zip code)	
NJD089216790	o LIST	ER AVENUE		
		N.J. 07105		
CACHEMICAL SERVICES	- 111111	10.41		
V. WASTE IDENTIFICATION		Roberts Contract		E.
A. DESCRIPTION OF WASTE	B. DOT HA- ZARD CLASS	C. EPA .HAZARDOUS .WASTE .NUMBER (see instructions)	D. AMOUNT OF WASTE	UNIT OF
SPENT SULPHURIC ACID (PICKLE TANK)	01	W 0 6 2	2002000	F
RUST PREVENTATIVE OIL	07		5460	
				
		30 - 33 34 - 37		
C. COMMENTS (enter information by line number — see instructions)	20 20	38 - 41 42 - 45	es de la companya de	33

TAGENCY — PART A 102 of RCRA.) X. GENERATOR'S EPA I.D. NO. G N J D 0 0 5 4 4 5 1 0 G N J D 0 0 0 5 4 4 5 1 0 TO P.O. box, city, state, & zip code) TH CAROLINA, 29125 C. EPA ZARDOUS WASTE UMBER INSTRUCTIONS D. AMOUNT OF WASTE 13 14 13 14 15 15 15 15 15 15 15 15 15 15 15 15 15
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EPA Form 8700-13A (5-80)

Certificate of Insurance

acord.

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

FRANK B. HALL & CO. OF MICHIGAN
200 Renaissance Center, Suite 3200
Detroit, Michigan 48243
Mailing Address: P. O. Box 260-A

Detroit, Michigan 48232

NAME AND ADDRESS OF INSURED

Quanex Corporation, et al. Atlantic Tube Division 20 Harmick Road South Plainfield, New Jersey 07080

COMPANIES	AFFORDING COVERAGES II
COMPANY A	The Home Insurance Company
COMPANY B	National Union Fire Insurance Co.
COMPANY C	NEW YORK, NEW YORK 10007
COMPANY D	

This is to certify that policies of insurance listed below have been issued to the insured named above and are in force at this time. Notwithstanding any requirement, term or condition of any contract or other document with respect to which this certificate may be issued or may pertain, the insurance afforded by the policies described herein is subject to all the terms, exclusions and conditions of such policies.

terms, ex	terms, exclusions and conditions of such policies.													
COMPANY			POLICY	Limits of Liability in Thousands (000)										
LETTER	TYPE OF INSURANCE	POLICY NUMBER	EXPIRATION DATE		EACH OCCURRENCE	AGGREGATE								
	GENERAL LIABILITY			BODILY INJURY	\$	\$								
A	X COMPREHENSIVE FORM	GA 99-67-71	12-31-82	BODIET HOOKT										
PER COLUMN	PREMISES—OPERATIONS	(Texas)		PROPERTY DAMAGE	\$	\$								
	EXPLOSION AND COLLAPSE HAZARD													
Berein	UNDERGROUND HAZARD PRODUCTS/COMPLETED	GL 99-40-88	12-31-82											
	OPERATIONS HAZARD	(All Other)		BODILY INJURY AND										
27	BROAD FORM PROPERTY			PROPERTY DAMAGE COMBINED	\$1,000	1,000								
	DAMAGE INDEPENDENT CONTRACTORS			COMBINED										
	PERSONAL INJURY													
				PERSONAL II	NJURY	\$								
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	HIRED			PROPERTY DAMAGE	\$									
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and here														
THE R. LEWIS CO., LANSING	NAME AND ADDRESS OF TAXABLE PARTY.													

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES

It is hereby agreed and understood that this certificate is issued to comply with the Federal Regulations regarding sudden and accidental pollution.

Cancellation: Should any of the above described policies be cancelled before the expiration date thereof, the issuing company will endeavor to mail 60 days written notice to the below named certificate holder, but failure to mail such notice shall impose no obligation or liability of any kind upon the company.

NAME AND ADDRESS OF CERTIFICATE HOLDER:

Environmental Protection Agency

Region 2

26 Federal Plaza

New York, New York 10007

Attn: Helen S. Beggun

DATE ISSUED: September 1, 1982

James A. Cunningham

8

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

- 1. The Home Insurance Company, P. O. Box 6509, Grand Rapids, Michigan 49506 and National Union Fire Insurance Company, P. O. Box 5058, Southfield, Michigan 48075, [the "Insurers"], hereby certify that they have issued Liability insurance covering Bodily Injury and Property Damage to Quanex Corporation, et al., (the "Insured"), of 4801 Woodway, Houston, Texas 77056, in connection with the Insured's obligation to demonstrate financial responsibility under 40 CFR 284.147 or 285.147. The coverage applies at EPA NJD000544510, Atlantic Tube Division, 20 Harmick Road, South Plainfield, New Jersey 07080 for sudden accidental occurrences. The limits of liability are \$1,000,000 each occurrence and \$2,000,000 annual aggregate, exclusive of legal defense costs. The coverage is provided under policy numbers (see attached), issued on December 31, 1981. The expiration date of said policies are December 31, 1982.
- 2. The Insurers further certify the following with respect to the insurance described in Paragraph 1:
 - (a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.
 - (b) The Insurers are liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the Insured for any such payment made by the Insurers. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in 40 CFR 284.147(f) or 285.147(f).
 - (c) Whenever requested by a Regional Administrator of the U. S. Environmental Protection Agency (EPA), the Insurers agree to furnish to the Regional Administrator a signed duplicate original of the policy and all endorsements.
 - (d) Cancellation of the insurance, whether by the Insurers or the Insured, will be effective only upon written notice and only after the expiration of sixty (60) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.
 - (e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty (30) days after a copy of such written notice is received by the Regional Administrator(s) of the EPA Region(s) in which the facility(ies) is (are) located.

AGREE1/J/37 9/1/82/JFM/sd

HAZARDOUS WASTE FACILITY CERTIFICATE OF LIABILITY INSURANCE

- Continued -

I hereby certify that the wording of this instrument is identical to the wording specified in 40 CFR 284.151(j) as such regulation was constituted on the date first above written, and that the Insurers are licensed to transact the business of insurance, or eligible to provide insurance as an Excess or Surplus Lines Insurer, in one or more States.

The Home Insurance Company

National Union Fire Insurance Company

James A. Cunningham
Authorized Representative of The Home Insurance Company

and National Union Fire Insurance Company

Frank B. Hall & Co. of Michigan

P. O. Box 260-A

Detroit, Michigan 48232

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VII. SIC CODES (4-digit, in order of priority)			
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(specify)	7	(specify)	
VIII. OPERATOR INFORMATION	15 16 - 11		
	IAME		B. Is the name listed in Item VIII-A also the
B QUANEX CORPORATION			owner?
15 16			YES NO
C. STATUS OF OPERATOR (Enter the appropriate letter in	to the answer box; if "Other	", specify.)	D. PHONE (area code & no.)
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify)	P (specify)	A	713 961 4600
P = PRIVATE E. STREET OR P.O. BOX	56	15	16 - 18 19 - 21 22 - 25
		T	
4801 WOODWAY SUITE 2	80 WEST	55	
F. CITY OR TOWN	G.STAT		IAN LAND
BHOUSTON	TX	77001	acility located on Indian lands? YES NO
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X. EXISTING ENVIRONMENTAL PERMITS			
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XI. MAP			
Attach to this application a topographic map of the area e the outline of the facility, the location of each of its exis	xtending to at least one r ting and proposed intake	nile beyond property bo	ounderies. The map must show
treatment, storage, or disposal facilities, and each well wi	nere it injects fluids und	erground. Include all sp	rings, rivers and other surface
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XIII. CERTIFICATION (see instructions)			
I certify under penalty of law that I have personally exam attachments and that, based on my inquiry of those pe	rsons immediately respo	nsible for obtaining the	information contained in the
application, I believe that the information is true, accura false information, including the possibility of fine and imp	te and complete. I am av	vare that there are signi	ificant penalties for submitting
	B. SIGNATURE	ENDER DE L'ANDRE	C. DATE SIGNED
DAHN E. CAPPEL		0 .11	0/1-
GENERAL MANAGER	Salin K.	Cappel	182/80
COMMENTS FOR OFFICIAL USE ONLY		-	
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PA Form 3510-1 (6-80) REVERSE			STATE OF STA

⊕ EDA

HAZARDOUS WASTE PERMIT APPLICATION

I. EPA I.D. NUMBER

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AF	PP	RO	TIO	N DATE RECEIVED	D	NAME OF					C	OMMENTS		N. C.				
		2.3		80111	9													
II.	II. FIRST OR REVISED APPLICATION																	
EP	Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above. A. FIRST APPLICATION (place an "X" below and provide the appropriate date)																	
A.															-7-4-74	b		
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В.	B. REVISED APPLICATION (place an "X" below and complete Item I above)																	
	1. FACILITY HAS INTERIM STATUS																	
	III. PROCESSES – CODES AND DESIGN CAPACITIES																	
	A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C). B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process. 1. AMOUNT — Enter the amount. 2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.																	
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III. PROCESSES (continued)

- C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.
 - SOI- STORE SLUDGE IN APPROVED 55 GAL. DRUMS. WHEN TRUCKLOAD OF DRUMS IS ACCUMULATED THEY ARE THEN PROPERLY AND LEGALLY SENT TO AN APPROVED DUMP AREA FOR BURIAL OR INCINERATION.
 - 502- SPENT SULPHURIC ACID. DISPOSED OF BY NEUTRALIZATION AT AN APPROVED FACILITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

- EPA HAZARDOUS WASTE NUMBER Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	. P	KILOGRAMS	. K
TONS	T	METRIC TONS	. M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

- PROCESS CODES:
 - For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
 - For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
 - Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code/s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER - Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- 'included with above" and make no other entries on that line,
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) - A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

ш	M A. EPA			D POTILITIES		UNIT											D. PROCESSES		
	HAZARD. B. ESTIMATED ANNUAL QUANTITY OF WASTE			SURE (enter code)			1. PROCESS CODES (enter)									2. PROCESS DESCRIPTION (if a code is not entered in D(1))			
X-1	K		0	5	4	900		P	T	0	3	D	8	0				1	
X-2	D	2	0	0	2	400		P	T	0	3	D	8	0			1		
X-3	D)	0	0	1	100		P	T	0	3	D	8	0			-	-	
X-4		1		-	2													1	included with above

6	EPA I.D. NUN	ABER (enter from page 1)	1	1,	5		FO	ROFFIC	IAL USE	ONLY	alides II	1111111			
WA	JDOO	054451031	1	1	W			DUP		3 2	DUP				
IV.		ON OF HAZARDOUS WASTE	-	-		>	TO SEE	NEW	No.	D. PROCE	Sere	DESCRIPTION OF THE PERSON			
LINE NO.	The second secon	9	UNIT MEA URE enter code)			1. PROCE	ter)		2. PROCESS DESCRIPTION (if a code is not entered in D(1))						
1	K062	2.835,00000		P	TO	1	083	27 - 29	27 - 29		ALIZAT	TION			
2	Dool	34,320000		P	To	3			1.1	INCIN	INCINERATION				
3	D002	27.000000		P			080			LANDFILL					
4	0000	72.000000		P	50	ı	080			LANDE	Thh				
5															
6					1 1			1 1							
7					1 '		1 1	1 1							
8			A		1.1.1		ar.								
9					11										
10															
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14										Dist.					
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20										i kog istrati					
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22											- CL	na Transport			
23															
24															
25								1 1							
26	23 - 26		1	36	27 -		27 - 28	27 - 29	27 - 29						
EPA F	orm 3510-3 (CONTINUE ON REVERSE			

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